

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE: NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION

MDL No. 2419

Dkt. No. 1:13-md-02419-RWZ

THIS DOCUMENT RELATES TO:

Kennedy, et al. v. Unifirst, et al., No. 1:13-cv-13227; *Kennedy, et al. v. Advanced Pain & Anesthesia Consultants, et al.*, No. 1:14-cv-13689

Musselwhite v. Unifirst, et al., No. 1:13-cv-13228; *Musselwhite v. Advanced Pain & Anesthesia Consultants, et al.*, No. 1:14-cv-13676

Wynstock, et al. v. Ameridose, et al., No. 1:14-cv-12884

Jeffries, et al. v. Ameridose, et al., No. 1:14-cv-12789

Edwards v. Unifirst, et al., No. 1:13-cv-13209

**PLAINTIFFS' MOTION TO MODIFY THE THIRD AMENDED
PROTECTIVE ORDER OF CONFIDENTIALITY**

The Plaintiffs' Steering Committee (PSC) moves to modify this Court's Third Amended Protective Order of Confidentiality (Dkt. # 814) governing the discovery conducted within this Court pursuant to Paragraph 23 of the Order. The specific changes and the reasons they are requested are detailed in the accompanying Memorandum in Support of Plaintiffs' Motion to Modify the Third Amended Protective Order of Confidentiality. The PSC also submits a

[Proposed] Fourth Amended Protective Order of Confidentiality with the requested changed language.

Dated: July 18, 2016

Respectfully submitted,

A handwritten signature in blue ink that reads "Mark Chalos". The signature is fluid and cursive, with the first name "Mark" and last name "Chalos" clearly distinguishable.

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Plaintiffs' Steering Committee

CERTIFICATE OF SERVICE

I, Mark P. Chalos, hereby certify that on this day 18th of July 2016, a copy of the foregoing document, along with the Memorandum in Support of Plaintiffs' Motion to Modify the Third Amended Protective Order of Confidentiality, and [Proposed] Fourth Amended Protective Order of Confidentiality were electronically filed. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's System.


Mark P. Chalos